LAW OFFICES OF MICHAEL S. LAMONSOFF, PLLC

Michael S. Lamonsoff, Esq. o Seth J. MacArthur, Esq. o Michael C. O'Malley, Esq. o Darren T. Moore, Esq. o Joshua Versoza, Esq. Stacey Haskel, Esq.

Also Admitted in
oE.D.N.Y.
as.D.N.Y
N.J. Federal Court
Also admitted in New Jersey
Also admitted in Massachusetts



Jessica Massimi, Esq. ∘ △ Jonathan Wachlarz, Esq. ∘ △ Jeffrey Bloomfield, Esq. ∘ △ Crystal Abreu, Esq. Anthony Sears, Esq. Maya Kogan, Esq. ⋄ Robert E. Borrero, Esq. △

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March 20, 2018

BY EMAIL

Honorable Richard Berman United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Martinez v. The City of New York, et al., 16 CV 7343 (RMB)

Your Honor:

This firm represents the Plaintiff. This letter is respectfully submitted to request leave to file Plaintiff's anticipated opposition to Defendants' letter at ECF No. 92 under seal. On February 21, 2018, the Court directed the parties to file letter briefs regarding the potential conflict in the City of New York's joint representation of the individual Defendants in this matter. Tomorrow, Plaintiff intends to file an opposition Defendants' letter at ECF No. 92. In his letter, Plaintiff intends to reference certain medical records that have been marked confidential by the Defendants during this litigation. Accordingly, Plaintiff respectfully requests leave to file his opposition under seal. Plaintiff thanks the Court for its time and attention.

Respectfully submitted,

/s/

JESSICA MASSIMI (JM-2920)